



The Ottinger Firm, P.C.
Employment Attorneys

20 W. 55th St. 6th Floor
New York, NY 10019
p. 212.571.2000 f. 212.571.0505
1 Market, Spear Tower, Ste 3600
San Francisco, CA 94105
p. 415.906.5417 f. 415.520.0555
www.ottingerlaw.com

George D. Vallas
george@ottingerlaw.com

October 31, 2013

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
Netburn_NYSDChambers@nysd.uscourts.gov

Re: O'Reilly v. Crumbs Holdings, LLC, No. 13-cv-2720
Discovery Extension Request

Dear Judge Netburn:

This Firm represents Plaintiff Jennifer O'Reilly in the above-referenced matter. We write jointly on behalf of all parties in accordance with Your Honor's Individual Rule 1(a) to respectfully request an extension of the discovery deadline, or, in the alternative, a telephone conference to discuss a discovery extension. This is the Parties' first request for an extension.

As this Court is aware, the Parties entered into a Stipulation and Proposed Order for Conditional Certification and Notice Under the Fair Labor Standards Act, which was so ordered by the Court on October 8, 2013. The Parties have been working cooperatively to comply with the deadlines set forth in that Stipulation and Order.

The deadline for the close of fact discovery is currently December 12, 2013, four weeks after the end of the Notice Period on November 21, 2013. Given the potential that Opt-in Plaintiffs may join the suit as late as November 21, the Parties believe that it will not be possible, despite their diligent efforts, to complete discovery before the current deadline.

Accordingly, the Parties respectfully request that the current discovery deadline be extended by sixty days to February 12, 2014. In the alternative, the Parties respectfully request a telephone conference with the Court to discuss the proposed extension.

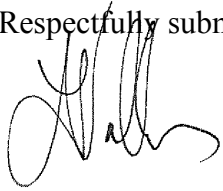
The Honorable Sarah Netburn

October 31, 2013

Page 2

The parties thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Vallas', with a stylized, cursive script.

George Vallas

cc: Lyle Zuckerman, Esq. (Counsel for Defendant - by email)